

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Christopher V. Cotton (Admitted *Pro Hac Vice*)
SHOOK, HARDY & BACON L.L.P.
2555 Grand Boulevard
Kansas City, MO 64108
Telephone: (816) 474-6550
ccotton@shb.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION TO
WITHDRAW AS COUNSEL OF RECORD**

This Document Relates to:

*John Doe 692195 v. Uber Technologies,
Inc., et al., Case No. 3:25-cv-03421*

Judge: Honorable Charles R. Breyer

DECLARATION OF CHRISTOPHER V. COTTON

I, Christopher V. Cotton, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Kansas City, Missouri. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Defendants”) opposition to Kherkher Garcia LLP’s (“Kherkher Garcia”) motion to withdraw as counsel for Plaintiff John Doe 692195.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Defendants in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of Iowa, the Bar of the State of Missouri, and the Bar of the State of Wisconsin. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On behalf of Plaintiff John Doe 692195, Kherkher Garcia submitted a Plaintiff Fact Sheet (PFS) on May 17, 2025, but failed to submit an accompanying verification to the PFS.

4. On July 24, 2025, counsel for Uber communicated to Kherkher Garcia via a PFS Deficiency Notice that Plaintiff John Doe 692195’s PFS was deficient for lack of verification.

5. On August 23, 2025, Kherkher Garcia served an Amended Plaintiff Fact Sheet on behalf of Plaintiff John Doe 692195, again without a verification.

6. On December 3, 2025, counsel for Uber emailed Kherkher Garcia to provide notice pursuant to Amended PTO 10, Section 9(b), that Plaintiff John Doe 692195’s most recent PFS was materially deficient due to Plaintiff’s failure to serve a verification, and to request a meet and confer by Friday, December 5, 2025.

7. On December 5, 2025 at approximately 1:30 PM Pacific, I met and conferred with counsel from Kherkher Garcia, who stated that counsel was trying to reach Plaintiff John Doe 692195 to confirm his intention to dismiss his case, and that the firm intended to withdraw as counsel for Plaintiff John Doe 692195 if counsel did not hear from him within one week. I stated that Uber would oppose the motion to withdraw.

1 I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is
2 true and correct. Executed on December 19, 2025, in Kansas City, Missouri.

3
4 **SHOOK, HARDY & BACON L.L.P.**

5 /s/ Christopher V. Cotton

6 CHRISTOPHER V. COTTON

7 (admitted *Pro Hac Vice*)

8 c cotton@shb.com

9 **SHOOK, HARDY & BACON L.L.P.**

10 2555 Grand Blvd.

11 Kansas City, MO 64108

12 Telephone: (816) 474-6550

13 *Attorney for Defendants*

14 UBER TECHNOLOGIES, INC., RASIER,
15 LLC, and RASIER-CA, LLC
16
17
18
19
20
21
22
23
24
25
26
27
28